STUART M SMITH
NOTC

GCN

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667
TDD (804) 371-8737

APR 30 1991 Certified-Return
Receipt Requested

J. Peter Aldred, Environmental Engineer
Intermet Foundries, Inc.
P. O. Box 6200
Lynchburg, Virginia 24505

Re: VAD000820514, Compliance Inspection at Lynchburg Foundry Company's Lower Basin Facility

Dear Mr. Aldred:

During a recent (3-18-91) inspection made by the Department, it was noted that your facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by checkmarks on the enclosed checklists and are listed below:

1. Tank Management:

   The less than 90-day accumulation tank (baghouse) was not clearly marked with the word "Hazardous Waste" in violation of VHWMR § 6.4.E.1.c.

2. Contingency Plan:

   a. The Contingency Plan needs to be revised to include arrangements to be made with the Commonwealth and local emergency response teams as required by VHWMR § 9.3.B.3.

   b. Copies of the revised Contingency Plan are to be sent to the Lynchburg Fire and Police Departments, the Lynchburg General Hospital, the Virginia Department of Emergency Services, the Department of Waste Management and the local emergency response team as required by VHWMR § 9.3.C.

3. Land Disposal Restrictions:

a. The Land Disposal Restricted waste did not have the required notifications to the treatment facility, such as EPA Hazardous Waste Number, treatment standards and manifest number associated with the waste shipments in violation of VHWMR §§ 15.1.G.1a., 15.1.G.1.b.1a., 15.1.G.1.1b. and 15.1.G.1.b.1c.

b. The notices, certifications and other documentation are not retained for at least five years from the date the waste was last sent to off-site treatment in violation of VHWMR § 15.1.G.f.

During the inspection, you indicated that the baghouse dust was transported off-site using the proper manifest to Lynchburg Foundry's Archer Creek facility for treatment. You did not provide the land disposal restriction notification to the Lynchburg Foundry Archer Creek facility. Please note that placement of baghouse dust (EPA waste codes D006/D008) is considered land disposal and is a violation of VHWMR § 15.1.A.3. We will refer this matter to EPA Region III for resolution.

Please take the necessary corrective actions to bring your facility into compliance within 30 days of receipt of this letter and document the corrective actions to the Department via correspondence.

If there are any questions, please feel free to call me at (804) 225-3754.

Sincerely,

Glenn Moore

Glenn Moore, Chemist
Division of Regulation

Enclosures
CC: Jack Finnagan
P. O. Box 6200
Lynchburh, Va. 24505

APRIL 1990

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: INTERMET FOUNDRIES, INC.

Address: LOWER BASIN FACILITY - CONCORD ROAD
P.O. BOX 6200
LYNCHBURG, VA. 24505

EPA ID Number: VAD000820514

Facility Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER - ENVIRONMENTAL ENGINEER

Telephone Number: (804) 528-8431

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 3/18/91

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) FOUNDRY

2. Give a brief description of the waste stream(s) and hazardous waste code(s) generated by the firm.

CUPOLA BAGHOUSE DUST - D006/D008
SAFETY KLEEN PARTS CLEANING STATIONS } D001/D008 UNTIL 10/90
} D001/D039 SINCE 10/90
WASTE PAINT & SOLVENTS F003/F005/D001
PRODUCTION CHANGES - F001/F002 & D001

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D006/D008	~ 70 TONS/MO	0
D001/D008 until 10/90	32 gals/MO	0-SK CLEANING STATION
D001/D039 since 10/90	20 gals/MO	0
F003/F005/D001	45 gals/MO	0 PLANT SHUT DOWN
F002	10 gals/MO	0
D001		

4. Does the facility ever generate greater than: 1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? YES (NO)

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? YES (NO)

If yes, then the facility is a generator.

5. How is the waste presently being handled? Where is it sent?
TO OFFSITE TSD VIA H.W. MANIFEST
See List on Page 4

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. YES (NO)

7. Does the facility generate any hazardous waste that is burned for energy recovery (hazardous waste fuel)? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES (NO)

8. Does the facility generate any used oil that is burned for energy recovery (used oil fuel), including used oil that is also a characteristic hazardous waste, or used oil that is mixed with hazardous waste generated by a conditionally exempt Small Quantity Generator? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. (YES) NO
USED OIL PICKED up By EASTERN WASTE OIL CO. AND
SENT TO be 4020 CAROLYN DRIVE
RECLAIMED or BURNED ROANOKE, VA. 24019

9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES (NO)

_____

_____

_____

10. Does the facility generate, transport or collect spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES (NO)

11. Based on the above, the facility is a:

a. conditionally exempt small quantity generator
b. small quantity generator
(c.) generator
d. permitted or interim status TSD
e. unpermitted TSD (explain in comments section)

[Circle One]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

13. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that site.]

Location	Number of Containers	Number of Tanks	Capacity
BAGHOUSE #1		#1 D006/D008	2-3 TONS
BAGHOUSE #2		#2 - D006/D008	2-3 TONS
M. SHOP	1-16 gal		
F.L. SHOP	1-16 gal		
ACCUMULATION AREA	0		

14. Comments

BAGHOUSE DUST
D006/D008

INTERMET FOUNDRIES, INC.
LFC- ARCHER CREEK FACILITY
CAMPBELL COUNTY
LYNCHBURG, VA. 24505
VAD000820506

D001/D039
D001/D008

SAFETY KLEEN CORP.
RT. 24.
VINTON, VA. 24179
VAD000737361

D001,
F002 - waste Paint F003/F005/D001

ALL WORTH, INC.
500 MEDCO
BIRMINGHAM, AL 35217
ALD094476793

LFC-LB # 1

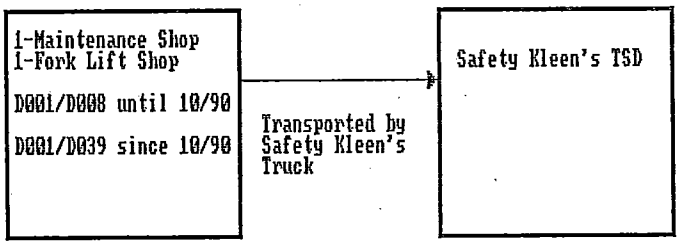
Intermet Foundries, Inc.

Lynchburg Foundry Company

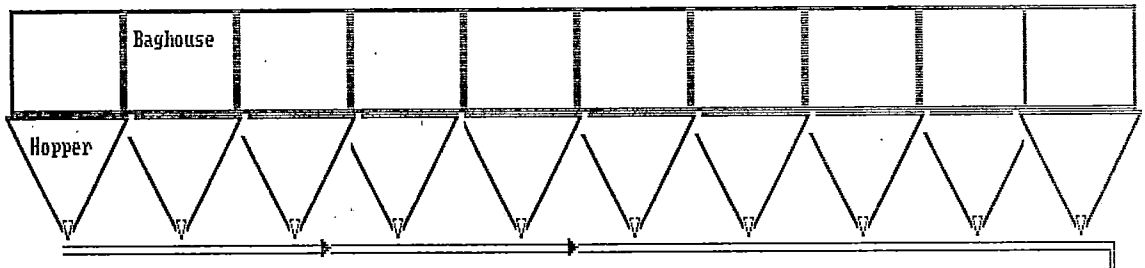
Lower Basin Facility

March 18, 1991

Safety Kleen Parts Cleaners



Lynchburg Foundry Company-Lower Basin's Baghouses& Hoppers(Green Sand-10 sections & Shell-12 sections)



Cupola Baghouse Dust D006/D008

Baghouse dust trucked in from LFC-Lower Basin facility in concrete mixer trucks, weighted and taken to the waste pile for treatment.

Truck Weighted and taken to

Hazardous Waste Pile treatment

Area at the Lynchburg Foundry's

Archer Creek Facility (interium status TSD)

Dump Truck D006/D008

After treatment the waste is trucked to the on-site Solid Waste Landfill at Archer Creek. Treated waste is sampled monthly, raw waste sampled annually from both facilities.

Baghouse dust mixed with non-hazardous materials, considered treatment.

Archer Creek's on-site Landfill

Other drums waste are off spec. materials or contaminated. This is labelled and dated before being placed in the

Less than 90-day

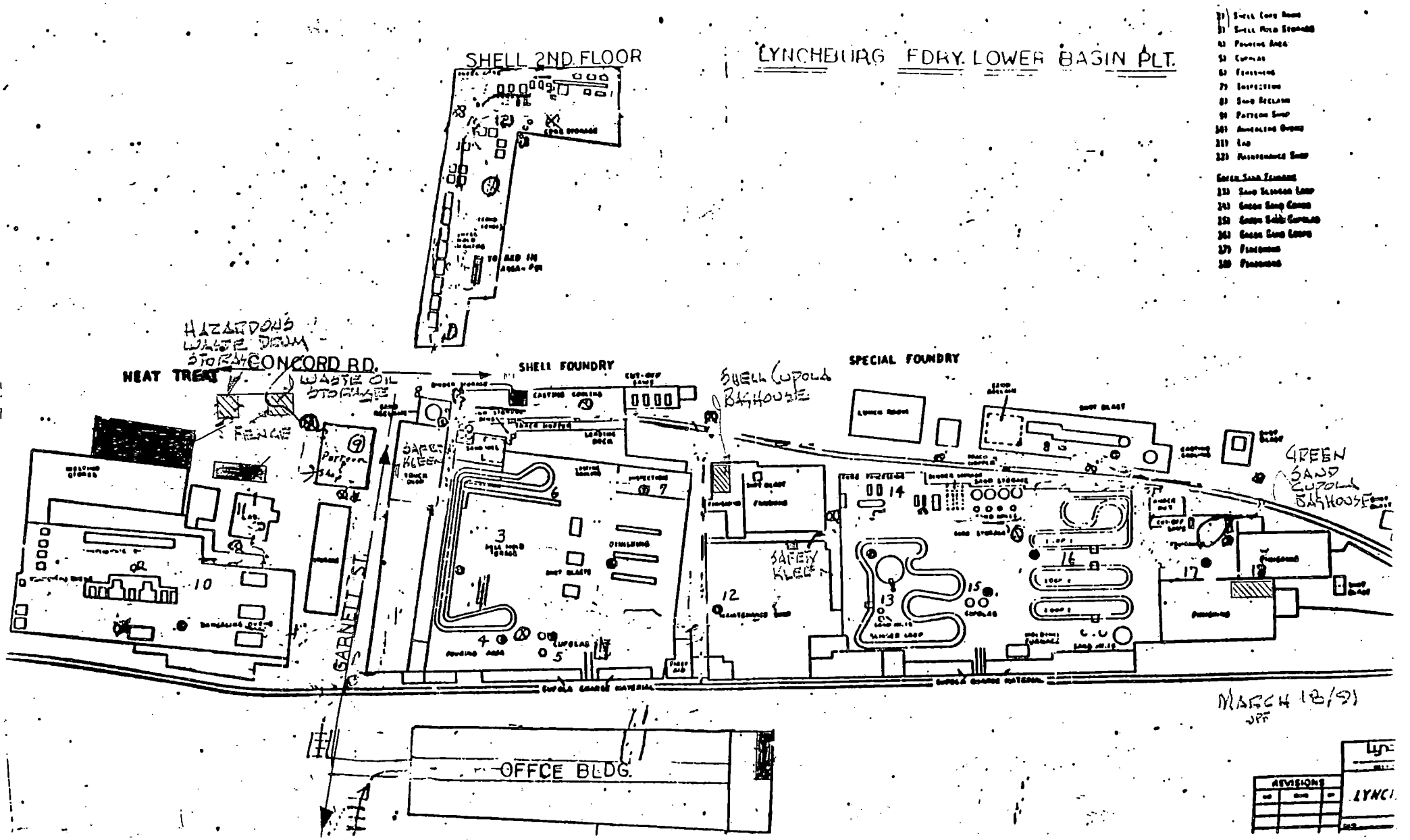
accumulation area.

Generally D001, D003 or F001.

Manifested and shipped to an off-site TSD with the necessary LDR certifications.

Transporter

Off-Site TSD


LYNCHBURG FDRY. LOWER BASIN PLT.
SHELL 2ND FLOOR
HAZARDOUS WASTE DRUM STORAGE
CONCORD RD.
HEAT TREAT
WASTE OIL STORAGE
FENCE
SHELL FOUNDRY
SHELL CUPOLA BAGHOUSE
SPECIAL FOUNDRY
GREEN SAND CUPOLA BAGHOUSE
SAFETY KLEEN
SAFETY KLEEN
GARNETT ST.
OFFCE BLDG.
MARCH 18/91
JPF
REVISIONS

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF GENERATORS

Name of Facility: INTERMET FOUNDRIES, INC

Address: LEC - LOWER BASIN FACILITY - COOCOO ROAR
P. O. BOX 6200 LYNCHBURG, VA. 24505

EPA ID Number: VAD 000 820 514

Facility Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER ENVIRONMENTAL ENGINEER

Telephone Number (804) 528-8431

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 3/18/91

Va. Hazardous Waste Reg.	Generator Checklist	
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	(YES) NO
6.2.C.	2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.]	(YES) NO
5.5.A.7	3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	(YES) NO
6.3 5.3.B.1.	4. Is the following information on the manifest:	

	a. The generator's name, mailing address, EPA ID Number, and telephone number?	YES NO
5.3.B.2.	**b.** A unique five digit number assigned to this manifest by the generator?	YES NO
5.3.B.3.	**c.** The total number of pages of the manifest?	YES NO
5.3.B.4.	**d.** The company name and EPA ID number of each transporter used?	YES NO
5.3.B.5.	**e.** The company name, site address, and EPA ID number of the facility designated to receive the waste?	YES NO
5.3.B.6.	**f.** The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	YES NO
5.3.B.7.	**g.** The quantities of waste being shipped?	YES NO
5.3.C.	**h.** The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment."	YES NO

6.5.C.2. **5.** Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? (YES) NO

If no, has the generator filed an exception report with the Executive Director which included: YES NO NA

6.5.C.2.a. **a.** A legible copy of the manifest for which the generator does not have confirmation of the delivery; and YES NO NA

6.5.C.2.b. **b.** A cover letter explaining the efforts taken to locate the shipment? YES NO NA

6.4.E.1. **6.** Is hazardous waste being accumulated on-site for less than 90 days? If yes, (YES) NO

6.4.E.1.a. **a.** Is the waste stored in containers? (YES) NO
In tanks? (YES) NO
(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).

6.4.E.1.b. **b.** Is the date that accumulation begins clearly marked and visible for inspection on each container? (YES) NO

6.4.E.1.c. **c.** Is each ~~container~~ OK and tank clearly marked with the words "Hazardous Waste"? YES (NO)

6.4.E.1.e. **d.** Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? (YES) NO REVISION PROVIDED AT TIME OF INSPECTION

6.4.E.2. **7.** Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status. YES (NO)

6.4.E.1.d. **8.** Does the generator record inspections (YES) NO

9.1.F.4. in an inspection log?

6.4.E.1.d.
9.1.G.1. **9.** Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? (YES) NO

9.1.G.2. **10.** Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? (YES) NO

9.1.G.3. **11.** Do personnel participate in an annual review of the initial training? (YES) NO

12. Does the facility maintain a record of the following:

9.1.G.4.a. **a.** job titles for each position at the facility related to hazardous waste management; and (YES) NO

9.1.G.4.a. **b.** the name of the employee filling each job; and (YES) NO

9.1.G.4.b **c.** a written job description for each position in (a); and (YES) NO

9.1.G.4.c. **d.** a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and (YES) NO

9.1.G.4.d. **e.** Records that document that the training or job experience required above has been given to, and completed by facility personnel? (YES) NO

9.2.B.
9.2.D. **13.** At the facility, is the following equipment installed:

9.2.B.1. **a.** An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? (YES) NO

9.2.B.2. **b.** A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? (YES) NO

9.2.B.3. **c.** Portable fire extinguishers, fire control, and decontamination equipment?; and (YES) NO

9.2.B.4. **d.** Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? (YES) NO

9.2.C. **14.** Is a record of tests and inspections of items 13 a-d maintained at the facility? (YES) NO

9.2.E. **15.** Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? (YES) NO

6.4.E.1.d.
9.3. **16.** Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? (YES) NO

9.3.B. **17.** Does the contingency plan contain the following elements:

9.3.B.(1,2). **a.** A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? (YES) NO

9.3.B.3. **b.** A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required? YES (NO)

9.3.B.4. **c.** A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. (YES) NO

Name REID VASS

Title PLANT ENGINEER + MAINTENANCE

Telephone (804) 384-7703

9.3.B.5. **d.** A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? (YES) NO

9.3.B.6. **e.** Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities? (YES) NO

9.3.B.6. **f.** An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? (YES) NO

9.3.C. **g.** Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? YES (NO)

List: LYNCHBURG POLICE + FIRE DEPTS, LYNCHBURG GENERAL HOSPITAL

9.3.C.	**h.** Is there documentation to indicate the personnel listed above received the contingency plan?	YES (NO)
9.3.F.(9,10).	**i.** Has the contingency plan ever been implemented?	YES (NO)
	If yes, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?	YES NO N/A
6.4.E.3.a.	**18.** Does the generator have satellite accumulation areas? If yes,	YES (NO)
	a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	YES NO N/A
6.4.E.3.a.(1) 9.8.B.	**b.** Are the containers in good condition?	YES NO N/A
6.4.E.3.a.(1) 9.8.C.	**c.** Are the containers compatible with the waste?	YES NO N/A
6.4.E.3.a.(1) 9.8.D.1.	**d.** Are the containers kept closed except as necessary to add or remove waste?	YES NO N/A
6.4.E.3.a.(2)	**e.** Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	YES NO N/A
6.5.E.3.b.	**f.** Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,	YES NO N/A
	(1) Has the generator marked the **excess amount** with the date the excess amount began accumulating?	YES NO N/A
	(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? Namely, has he notified the	YES NO N/A

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? _____

_____

6.5.A. **19.** Does the generator retain copies of all manifests, annual reports, and test results for at least three years? (YES) NO

6.5.B. **20.** Has the facility submitted an annual report for the preceding calendar year? (YES) NO

21. Comments: _____

_____

_____

_____

_____

_____

_____

APRIL 1990

INSPECTION CHECKLIST FOR THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: INTERMET FOUNDRIES, INC.

Address: LFC-LOWER BASIN FACILITY - CONCORD ROAD
P.O. BOX 6200 LYNCHBURG, VA. 24505

EPA ID Number: VAD 000 820 514

Facility Inspection Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER - ENVIRONMENTAL ENGINEER

Telephone Number: (804) 528-8431

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 3/18/91

Va. Hazardous Waste Reg.		
9.8.B.	1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? (YES) NO	
	If no, list the storage/accumulation areas where there are problems and the type of problem:	
	Location / Problem	
	_____ / _____	
	_____ / _____	
	_____ / _____	
	_____ / _____	
9.8.C.	2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored? (YES) NO	

6.4.E.b	3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	(YES) NO
6.4.E.c.	4. Is the container labeled or marked clearly with the words "Hazardous Waste"?	(YES) NO
9.8.D.1.	5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If no, list the locations where open containers are found. _____ _____ _____ _____	(YES) NO
9.8.E.	6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	(YES) NO
9.1.F.2.a. 9.1.F.4. 6.4.E.1.d.	7. <u>For large quantity generators and TSD facilities only</u>: Is an inspection log maintained?	(YES) NO
9.8.F.	8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?	(YES) NO
9.8.G.1.	9. Are incompatible wastes placed in separate containers?	(YES) NO
9.8.G.3.	10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	(YES) NO

6.4.E.3.a. 11. For satellite accumulation areas: NA

a. Are there more than 55 gallons of any one type of waste present in the area? YES NO

If yes,

6.4.E.3.b b. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days? YES NO NA

If yes,

6.4.E.3.b. 6.4.E.1.b. c. Has the company notified the Department about the location of the accumulation area? NA YES NO

10. Comments:

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE INSPECTIONS OF TANKS

Name of Facility: INTERMET FOUNDRIES, INC.

Address: LFC-LOWER BASIN FACILITY - CONCORD ROAD
P.O. Box 6200 LYNCHBURG, VA. 24505

EPA ID Number: VAD000 820514

Facility Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER - ENVIRONMENTAL ENGINEER

Telephone Number: (804) 528-8431

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 3/18/91

VHWMR Ref.

6.4.E.1.e. 1. Has the generator notified the Executive Director of the location of all hazardous waste **tank** accumulation areas? (YES) NO
PROVIDED AT THE TIME OF THE INSPECTION

List all of the tank accumulation areas and give a brief description of each one. Include the age of each tank, if known, and the type of waste stored.

BAGHOUSE #1 - SHELL
#2 GREEN SAND

Is the tank used to store hazardous waste for greater than 90 days (or 180 or 270 days for a SQG)? YES (NO)

If yes, then has the facility applied for a hazardous waste storage permit? YES NO NA

6.4.E.1.c.	**2.** Is each tank marked with the words "Hazardous Waste"?	YES (NO)
9.9.A.1.	**3.** Is the tank used to store or treat hazardous waste that contains no free liquids as demonstrated by the Paint Filter Liquids Test (i.e., solids only)?	(YES) NO
9.9.A.2.	**4.** Does the tank (including sumps) serve as part of a primary secondary containment system to collect or contain releases of hazardous waste?	YES (NO)
9.9.D.1.	**5.** Does the facility have any of the following units:	
9.9.D.1.a.	**a.** New tank systems installed since January 1, 1988?	YES (NO)
9.9.D.1.b	**b.** Existing tanks used to store F020, F021, F022, F023, F026, or F027?	YES (NO)
9.9.D.1.c	**c.** Existing tanks whose documented age is greater than fifteen years of age? 1987 - 1988	(YES) NO
9.9.D.1.c.	**d.** Existing tanks whose documented age is less than fifteen years of age? If yes, when will the tank become fifteen years old?_____	YES (NO)
9.9.D.1.d.	**e.** Existing tanks for which the age cannot be documented within eight years of January 12, 1987? If yes, when will the facility become fifteen years old?	NA YES NO
9.9.D.1.	**6.** Has secondary containment been provided for each unit identified by (a) through (e) above? If no, identify the units for which secondary containment has not yet been provided. _____	(YES) NO

9.9.D.2 **7.** Does the secondary containment provided for units identified by 5(a) through (e) meet the following requirements:

9.9.D.2.a. **a.** Is the secondary containment designed, installed and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system? YES NO

9.9.D.2.b. **b.** Is the secondary containment system capable of detecting and collecting any releases and accumulated liquids until the collected material can be removed? YES NO

9.9.D.3.a **c.** Is the secondary containment constructed of or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation? YES NO

9.9.D.3.b. **d.** Is the secondary containment placed on a foundation or base capable of providing support to the secondary containment system and resistance to pressure gradients above and below the system owing to settlement, compression or uplift? YES NO

9.9.D.3.c. **e.** Is the secondary containment provided with a leak-detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24- hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24-hours? YES NO

9.9.D.3.d. **f.** Is the secondary containment system sloped or otherwise designed or YES NO

operated to drain and remove liquids resulting from leaks, spills, or precipitation, and has waste that has spilled or leaked and accumulated precipitation been removed from the secondary containment within 24-hours or in as timely a manner as possible to prevent harm to human health or the environment?

9.9.D.4. **8.** Does the secondary containment for the tanks consist of one or more of the following:

9.9.D.4.a **a.** A liner (external to the tank); or (YES) NO

9.9.D.4.b **b.** A vault; or YES N/A NO

9.9.D.4.c **c.** A double-walled tank; or YES NO

9.9.D.4.d **d.** An equivalent device as approved by the Executive Director? YES NO

FOR EXTERNAL LINER SYSTEMS ONLY:

9.9.D.5.a. **9.** Is the external liner system:

9.9.D.5.a.1 **a.** Designed or operated to contain 100% of the capacity of the largest tank within its boundary; and (YES) NO

9.9.D.5.a.2 **b.** Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain the precipitation from a 25-year, 24-hour rainfall event; and (YES) NO

9.9.D.5.a.3 **c.** Free of crack or gaps; and (YES) NO

9.9.D.5.a.4 **d.** Designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tank? (YES) NO

FOR VAULT SYSTEMS ONLY:

9.9.D.5.b. **10.** Is the vault system: N/A

NA

9.9.D.5.b.1.	**a.** Designed or operated to contain 100 % of the capacity of the largest tank within its boundary; and	YES	NO
9.9.D.5.b.2.	**b.** Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient capacity to contain the precipitation from a 25-year, 24-hour rainfall event; and	YES	NO
9.9.D.5.b.3.	**c.** Constructed with chemical-resistant water stops in place at all joint (if any); and	YES	NO
9.9.D.5.b.4.	**d.** Provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete; and	YES	NO
9.9.D.5.b.5	**e.** Provided with a means to protect against the formation of and ignition of vapors within the vault, if the waste being stored or treated is ignitable or reactive; and	YES	NO
9.9.D.5.b.6.	**f.** Provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure?	YES	NO

FOR DOUBLE-WALLED TANKS ONLY:

NA

9.9.D.5.c.	**11.** Is the double-walled tank:		
9.9.D.5.c.1	**a.** Designed as an integral structure (i.e., an inner tank with an outer shell) so that any release from the inner tank is contained by the outer shell; and	YES	NO
9.9.D.5.c.2	**b.** Protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell; and	YES	NO
9.9.D.5.c.3.	**c.** Provided with a built-in,	YES	NO

continuous leak detection system capable of detecting a release within 24-hours or at the earliest practicable time; and

---

FOR ALL TANK UNITS:

9.9.D.6 **12.** Does the tank system have ancillary equipment? (YES) NO

If yes, does the ancillary equipment have secondary containment (e.g., trench, jacketing, double-walled piping) which meets the requirements of item #7 above? If no, please explain. (YES) NO

_____

_____

_____

9.9.D.8 **13.** For all tank systems for which secondary containment meeting the above requirements has not yet been provided, has the facility complied with the following for the units:

NA

9.9.D.8.a **a.** For non-enterable underground tanks, has a leak test been conducted at least annually? YES NO

NA

9.9.D.8.b **b.** For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection or other tank integrity examination by an independent, Virginia-registered professional engineer that addresses cracks, leaks, corrosion and erosion conducted at least annually? YES NO

NA

9.9.D.8.c **c.** Has the owner/operator maintained on file at the facility a record of the results of the above assessments? YES NO

NA

9.9.B.1 **14.** For each existing tank system which does not have secondary containment meeting the requirements of VHWMR Section 9.9.D [#7, 8, 9, 10, 11 and 12 above], has the owner/operator determined that the tank system is not leaking or is unfit for use? YES NO

NA

	If yes, is a copy of this written assessment reviewed and certified by an independent Virginia-registered professional engineer kept on file at the facility?	YES NO
9.9.E.2.	**15.** Has the owner/operator used appropriate controls and practices to prevent spill and overflows from tank or secondary containments systems, including	(YES) NO
9.9.E.2.a	**a.** Spill prevention controls (e.g. check valves, dry disconnect couplings)? Describe: CHECK VALVES	(YES) NO
9.9.E.2.b	**b.** Overfill prevention controls (e.g. level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)? Describe: AutoFEED Cut OFF	(YES) NO
9.9.E.2.c	**c.** Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation?	NA YES NO
9.9.F.1	**16.** Does the owner/operator inspect the following at least once each operating day:	
9.9.F.1.a	**a.** Overfill/spill control equipment (eg., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order; and	(YES) NO
9.9.F.1.b	**b.** The aboveground portions of the tank system, if any, to detect corrosion or releases or waste; and	(YES) NO
9.9.F.1.c	**c.** Data gathered from monitoring equipment and leak detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated accordin g to its design; and	(YES) NO

9.9.F.1.d	**d.** The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs or releases of hazardous waste?	(YES) NO
9.1.F.4.	**17.** Is a log of the inspections maintained at the facility?	(YES) NO
9.9.F.2	**18.** For all underground and in-ground hazardous waste storage tanks, are cathodic protection systems present?	YES NO NA
	If yes, is the cathodic protection inspected according to the following schedule:	NA
9.9.F.2.a	**a.** The proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually thereafter;	YES NO
9.9.F.2.b	**b.** All sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly;	NA YES NO
9.9.F.2.c	**c.** Is inspection of items a and b above documented in the facility operating record?	NA YES NO
9.9.D.8.d	**19.** Has any tank system or component been found to be leaking or unfit for use as a result of a leak test or assessment?	YES NO NA
9.9.E.3	**20.** Has a leak or spill occurred from any tank system?	YES (NO)

If the answer to questions 19 or 20 was yes, complete questions 21 through 27. Otherwise, skip to number 28.

9.9.G	**21.** For tank systems or secondary containment which have been determined to be leaking or unfit for use, or from which there has been a leak or spill, has the owner/operator satisfied the	NA

following requirements:

9.9.G.1	**a.** Has the owner/operator immediately stopped the flow of hazardous waste into the tank system or secondary containment and inspected the system to determine the cause of release?	YES	NO
9.9.G.2.a	**b.** For releases from the tank system, has the owner/operator, within 24-hours or at the earliest practicable time, removed as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system?	YES	NO
9.9.G.2.b	**c.** For releases to a secondary containment system, have all released materials been removed within 24-hours or in as timely manner as is possible to prevent harm to human health and the environment?	YES	NO
9.9.G.3.a	**d.** Prevented further migration of the leak or spills to soils or surface water?	YES	NO
9.9.G.3.b	**e.** Removed and properly disposed of any visible contamination of the soil or surface water?	YES	NO
9.9.G.4.a	**22.** Have all releases to the environment been reported to the Executive Director within 24-hours of detection?	YES	NO
9.9.G.4.c	**23.** Within 30 days of detection of release, has a report been submitted to the Executive Director?	YES	NO
	If <u>yes</u>, did the report contain the following information:		
9.9.G.4.c.1	**a.** Likely route of migration of the release; and	YES	NO
9.9.G.4.c.2	**b.** Characteristics of the surrounding soil; and	YES	NO
9.9.G.4.c.3	**c.** Results of any monitoring or sampling conducted in connection with	YES	NO

	the release, if available, or as soon as they became available; and	NA
9.9.G.4.c.4	**d.** Proximity to downgradient drinking water, surface water, and population areas; and	YES NO
9.9.G.4.c.5	**e.** Description of response actions taken or planned?	YES NO
9.9.G.5.c	**24.** If the cause of the release was a leak from the primary tank system into the secondary containment system, was the system repaired prior to returning the tank system to service?	YES NO NA
9.9.G.5.d	**25.** If the cause of the release was a leak to the environment from an underground or on-ground component of a tank system without secondary containment, did the owner/operator provide secondary containment before returning the unit to service?	YES NO NA
9.9.G.5.d	**26.** If the cause of the release was a leak to the environment from an aboveground component of a tank system without secondary containment, was the component visually inspected and repaired?	YES NO NA
9.9.G.6	**27.** For all units which have been repaired, if any, did the owner/operator obtain certification from an independent, Virginia-registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system <u>prior</u> to returning the unit to service?	YES NO NA
9.9.H.1	**28.** At closure of any hazardous waste tank system, did the owner/operator remove or decontaminate all hazardous waste residues, contaminated containment system components, contaminated soil, and structures and equipment contaminated with waste, and manage them as hazardous waste? OPERATING	YES NO NA
9.9.I	**29.** Are ignitable or reactive wastes placed in the tank system?	YES (NO)

If yes,: NA

9.9.I.1.a	**a.** Was the waste treated, render or mixed before or immediately after placement in the tank system so that the resulting waste, mixture or dissolved material no longer meets the definition of ignitable or reactive waste; or	YES NO
9.9.I.1.b	**b.** The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or	YES NO
9.9.I.1.c	**c.** The tank system is used solely for emergencies?	YES NO
9.9.I.2	**d.** Does the owner/operator comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line as required in NFPA's "Flammable and Combustible Liquids Code"?	YES NO
9.9.J.1	**30.** Are incompatible wastes, or incompatible wastes and materials placed in the tank system?	YES (NO)
	If yes, was the tank and all related equipment decontaminated first?	YES NO NA
9.9.K	**31.** Has the tank system been used to treat chemically or to store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or to treat chemically a hazardous waste with a substantially different process than any previously used in that tank system?	YES (NO)
	If yes,:	NA
9.9.K.1	**a.** Did the owner/operator first conduct waste analyses and trial treatment or storage tests?	YES NO
9.9.K.2	**b.** Did the owner/operator obtain written, documented information on similar waste under similar operating	YES NO NA

conditions to show that the proposed treatment or storage will not cause the tank, ancillary equipment or the secondary containment to rupture, leak, corrode or otherwise fail?

32. Comments: _____

APRIL 1990

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: INTERMET FOUNDRIES, INC.

Address: LFC-LOWER BASIN FACILITY - CONCORD ROAD
P.O. BOX 6200 LYNCHBURG, VA. 24505

EPA ID Number: VAD000820514

Facility Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER - ENVIRONMENTAL ENGINEER

Telephone Number: (804) 528-8431

Inspector's Name: GLENN MOORE

Title: CHEMIST

Date of Inspection:

1. Does the facility generate, transport, or treat, store or dispose any land-restricted wastes? (See Attachment) (YES) NO

If yes, please list:

D006 | D008 D001
D001 | D039
F002
F003 | F005 | D001

15.1.A.3. 2. Is land disposal of wastes listed in 1 above occurring? (YES) NO SEE NOTE AFTER #12

If yes, then:

15.1.A.3.a. a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment) YES (NO)

15.1.A.3.b. b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? YES (NO)

15.1.A.3.c. c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month? YES (NO)

15.1.E. d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction? YES (NO)

15.1.F. e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units? YES (NO)

15.1.C. 3. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition? YES (NO)

15.1.D.1. 4. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? YES (NO)
(If no, go to number 6)
[If yes, complete surface impoundment checklist]

[Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]

If yes, does the facility meet the following requirements:

NA

15.1.D.1.b
15.1.G.
15.3.C.
15.4.
15.3. a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G.or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3? YES NO

15.1.D.1.c.
9.10.B.1.
10.10.B.3. b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners? YES NO

15.1.D.1.c.
10.5. c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.? YES NO

15.1.D.1.d. d. Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states, YES NO

"I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?

15.1.D.1.d. e. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification? YES NO

15.1.G.1. 6. Has the owner/operator determined if his waste is a land restricted waste? (YES) NO

15.1.G.1a. 7. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? YES (NO)

Did the notification include the following information:

15.1.G.1.b.1a - EPA Hazardous Waste Number; YES (NO)

15.1.G.1.b.1b - The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C; YES (NO)

15.1.G.1.b.1c - The manifest number associated with the shipment of waste; YES (NO)

15.1.G.1.b.1d - Waste analysis data, where available? (YES) NO

NA

15.1.G.1.b. 8. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C? YES NO

a. Did the notification contain the following information: NA

15.1.G.1.b.1a - EPA Hazardous Waste Number; YES NO

NA

15.1.G.1.b.1b - The corresponding treatment standards and all applicable prohibitions; YES NO

15.1.G.1.b.1c - The manifest number associated with the shipment of waste; and YES NO

15.1.G.1.b.1d - Waste analysis data, where available? YES NO

15.1.G.1.b.2. b. Was the certification signed by an authorized representative, and did it state the following: YES NO

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

NA

15.1.G.1.c. 9. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions? YES NO

15.1.G.f. 10. Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? YES (NO) ✓

NA

15.1.G.2. 11. <u>For Treatment Facilities ONLY</u>: Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards? YES NO

NA

15.1.G.2. a. Has this testing been done at the frequency stated in the waste analysis plan? YES NO

15.1.G.2.a.
15.1.G.1.a.

b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities? YES NO NA

15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating: YES NO NA

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.

12. Is the generator storing land restricted waste? YES (NO)

15.5.1.a.

a. If yes, is the storage onsite solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal? YES NO NA

NOTE: PLEASE NOTE THAT PLACEMENT OF BAGHOUSE DUST (EPA WASTE CODES D006/D008) IN A WASTE PILE IS CONSIDERED TO BE LAND DISPOSAL AND A VIOLATION OF VHWMR.

Attachment - Land Restricted Wastes

Waste	Effective Date
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators	11/08/88
F001 - F005 generated via RCRA corrective actions or CERCLA response actions	11/08/88
Hazardous wastes containing less than 1% total F001 - F005 solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90
Dioxin wastes F020 - F023, F026 - F028	11/08/88
F020 - F023, F026 - F028 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). [Effective 7/8/87]

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greter than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. [Effective 7/8/87]

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. [Effective 7/8/87]

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. [Effective 7/8/87]

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. [Effective 11/8/90]

Liquid hazardous wastes, not primarily water, containing greater

than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. [Effective 11/8/88]

Wastes to Be Evaluated By August 8/8/88 (First Third Wastes)

F006 - F009
F019
K001
K004
K008
K011
K013 - K018
K020
K021
K022
K024
K030
K031
K035
K036
K037
K044 - K052
K060
K061
K062
K069
K071
K073
K083 - K087
K099
K101 - K104
K106
P001
P004
P005
P010
P011
P012
P015
P016
P018
P020
P030
P036
P037
P039
P041
P048
P050
P058
P059
P063
P068
P069
P070
P071
P081
P082
P084
P087
P089
P092
P094
P097
P102
P105
P108
P110
P115
P120
P122
P123
U007
U009
U010
U012
U016
U018
U019
U022
U029
U031
U036
U037
U041
U043
U044
U046
U050
U051
U053
U061
U063
U064
U066
U067
U074
U077
U078
U086
U089
U103
U105
U108
U115
U122
U124
U129
U130
U133
U134
U137
U151
U154
U155
U157
U158
U159
U171
U177
U180
U185
U188
U192
U200
U209
U210
U211
U219
U220
U221
U223
U226
U227
U228
U237
U238
U248
U249

WASTES TO BE EVALUATED BY JUNE 8, 1989 (Second Third Wastes)

F010
F011
F012
F024
K009
K010
K019
K025
K027
K028
K029
K038
K039
K040
K041
K042
K043
K095
K096
K097
K098
K105
P002
P003
P007
P008
P014
P026
P027
P029
P040
P043
P044
P049
P054
P057
P060
P062
P066
P067
P072
P074
P085
P098
P104
P106
P107
P111
P112
P113
P114

U002
U003
U005
U008
U011
U014
U015
U020
U021
U023
U025
U026
U028
U032
U035
U047
U049
U057
U058
U059
U060
U062
U070
U073
U080
U083
U092
U093
U094
U095
U097
U098
U099
U101
U106
U107
U109
U110
U111
U114
U116
U119
U127
U128
U131
U135
U138
U140
U142
U143
U144

U146
U147
U149
U150
U161
U162
U163
U164
U165
U168
U169
U170
U172
U173
U174
U176
U178
U179
U189
U193
U196
U203
U205
U206
U208
U213
U214
U215
U216
U217
U218
U235
U239
U244

WASTES TO BE EVALUATED BY MAY 8, 1990 (THIRD THIRD WASTES)

K002
K003
K005
K006
K007
K023
K026
K032
K033
K034
K093
K094
K100
P006
P009
P013
P017
P021
P022
P023
P024
P028
P031
P033
P034
P038
P042
P045
P046
P047
P051
P056
P064
P065
P073
P075
P076
P077
P078
P088
P093
P095
P096
P099
P101
P103

P109
P116
P118
P119
P121
U001
U004
U006
U017
U024
U027
U030
U033
U034
U038
U039
U042
U045
U048
U052
U055
U056
U068
U069
U071
U072
U075
U076
U079
U081
U082
U084
U085
U087
U088
U090
U091
U096
U102
U112
U113
U117
U118
U120
U121
U123

U125
U126
U132
U136
U139
U141
U145
U148
U152
U153
U156
U160
U166
U167
U181
U182
U183
U184
U186
U187
U190
U191
U194
U197
U201
U202
U204
U207
U222
U225
U234
U236
U240
U243
U246
U247

Wastes identified as being hazardous based on a characteristic alone

APRIL 1990

CHECKLIST FOR RCRA INSPECTION OF RECYCLABLE MATERIALS (USED OIL, HAZARDOUS WASTE FUEL, AND PRECIOUS METALS)

Name of Facility: INTERMET FOUNDRIES, INC.

Address: LFC- LOWER BASIN FACILITY - CONCORD Rd, P.O. BOX 6200, LYNCHBURG, VA. 24505

EPA ID Number: VAD 000 820 514

Facility Representative: JACK FINNAGAN - J.P. ALDRED

Title: PROJECT ENGINEER - ENVIRONMENTAL ENGINEER

Telephone Number: (804) 528-8431

Inspector Name: GLENN MOORE

Title: CHEMIST

Date of Inspection: 3/18/91

VHWMR Ref.

13.3.A.1. **1.** Does the facility generate, transport, market or recycle hazardous wastes that are burned for energy recovery (hazardous waste fuel) in any boiler or industrial furnace that is not regulated as an incinerator? Identify: _____ YES (NO)

13.4.A.1 **2.** Does the facility generate, market or recycle used oil that is burned for energy recovery (used oil fuel) in any boiler or industrial furnace that is not regulated as an incinerator except used oil mixed with hazardous wastes? Identify: RECLAIMED + BURNED (YES) NO

(Note: Used oil burned for energy recovery is regulated as used oil fuel rather than hazardous waste fuel if it is a hazardous waste solely because it exhibits a characteristic of hazardous waste and is not mixed with a hazardous waste, or if it

contains hazardous waste generated by a conditionally exempt SQG, or if it exceeds the following maximum levels of hazardous constituents (off-specification used oil fuel):

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Flash point	100 F minimum
Total Halogens	4000 ppm *

* Used oil which contains greater than 1000 ppm total halogens is assumed to contain halogenated hazardous waste and therefore be regulated as hazardous waste fuel unless the company has shown that the used oil does not contain hazardous waste. For those wastes shown not to contain hazardous waste, the maximum allowable total halogen level is 4000 ppm.)

13.5.A
13.5.B

3. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? YES (NO)

13.6.B.

4. Does the facility store spent batteries before reclaiming them? [Note: Persons who generate, transport, or collect spent batteries, or who store spent batteries but don not reclaim them are not subject to VHWMR Parts IV through XIII.] YES (NO)

For facilities who answered "Yes" to question 1, complete questions 5 through 10:

NA

5. Does the facility:

a)generate b)transport c)market d)burn

hazardous waste fuel? (circle one)

[Note: If facility is a transporter, complete transporter checklist.]

NA

6. For marketers of hazardous waste fuel:

a. For marketers who make the claim that the waste is legitimate hazardous waste fuel, how is this done? _____

_____

Identify each waste stream (if more than one stream is mixed together, identify each stream separately): _____

_____

_____

BTU value of each stream: _____

_____

_____

7. For marketers of hazardous waste fuel:

NA

13.3.B.1.a 13.3.E.2	**a.** Does the person market hazardous waste fuel only to those persons who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers or industrial furnaces as defined in VHWMR Part I?	YES NO
13.3.E.3.	**b.** Are the provisions of VHWMR Sections 6.4.E, 9. through 9.11., 10. through 10.11. and Part XI being adhered to?	NA YES NO
13.3.E.5.a	**c.** For marketers who ship hazardous waste fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the hazardous waste fuel will be burned in a boiler or industrial furnace only as defined in VHWMR Part I?	NA YES NO
13.3.E.5.b	**d.** For marketers who accept shipments of hazardous waste fuel from other marketers, has the accepter submitted the appropriate certification identified in c above?	NA YES NO
13.3.E.6.	**e.** In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep	NA YES NO

copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?

NA

13.3.B.2 **8.** For burners (recyclers): YES NO

a. Is the hazardous waste fuel burned only in an industrial furnace, industrial boiler or utility boiler as defined in VHWMR Part I? Identify:

_____

_____

NA

13.3.F.2 **b.** Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning activities and received an EPA Identification Number? YES NO

NA

13.3.F.3.a **c.** For short term accumulation by generators who burn their hazardous waste fuel on site, are the applicable accumulation provisions of VHWMR Section 6.4.E. being met (see generator checklist)? YES NO

NA

13.3.F.3.b
13.3.F.3.c **d.** For existing or new storage facilities who burn their hazardous waste fuel on site, are the applicable storage provisions of VHWMR Sections 9. through 9.11. or 10. through 10.11. respectively being met? YES NO

NA

13.3.F.4 **e.** Before the burner accepts his first shipment of hazardous waste fuel from a marketer, has he provided the marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number, and that he will burn the hazardous waste fuel only in a boiler or industrial furnace? YES NO

NA

13.3.F.5. **f.** In addition to any applicable generator or storer recordkeeping requirements, does the burner keep copies of all certification notices he sends for at least three years from the YES NO

date of his last transaction with the person to whom the certification was made?

13.3.C. **9. For generators of hazardous waste fuel:** generators of hazardous waste fuel are subject to VHWMR Parts V and VI. Complete Generator Checklist. NA

10. If the generator makes the claim that this is legitimate hazardous waste fuel, how is this done? _____

_____

Identify Waste: _____

_____

BTU value: _____

_____

For facilities who answered "Yes" to question 2, complete questions 11 through 14:

11. Does the facility:

a) generate b) market c) burn

used oil burned for energy recovery? (circle one) AND RECLAIMED

12. Has the inspector determined that the used oil is not mixed with hazardous waste? If not, do so. YES

13.4.A.2. Has the generator mixed hazardous waste with his used oil? TESTING - YES (NO)

If yes, explain: _____

_____

_____

(Complete the hazardous waste fuel section of the checklist if the used oil is burned for energy recovery.)

13.4.B.1.a **13.** For marketers of used oil fuel:

		NA
	a. Does the person market used oil fuel only to burners or other marketers who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers, industrial furnaces or used oil-fired space heaters as defined in VHWMR Part I?	YES NO
13.4.D.2.e	**b.** For marketers who ship used oil fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the used oil fuel will be burned in a boiler or industrial furnace only?	YES NO
13.4.D.2.e	**c.** For marketers who accept shipments of used oil fuel from other marketers, has the accepter submitted the appropriate certification identified in c above?	YES NO
13.4.D.2.f	**d.** In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?	YES NO
13.4.D.2.a	**e.** Has the marketer obtained analyses or other information documenting that the used oil fuel does not exceed the maximum levels allowed in question 2?	YES NO
13.4.D.2.c	**f.** Has the marketer completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number?	YES NO
13.4.D.2.d	**g.** For each shipment of off-specification used oil to be burned for energy recovery initiated by the marketer, has the marketer prepared and sent an invoice to the receiving facility?	YES NO

If yes, did the invoice contain the following information? NA

1. An invoice number; YES NO

2. His own EPA Identification number and the identification number of the receiving facility? YES NO

3. The names and addresses of the shipping and receiving facilities? YES NO

4. The quantity of off-specification used oil to be delivered? YES NO

5. The date of shipment or delivery? YES NO

6. The following statement; "This used oil is subject to EPA regulation under 40 CFR Part 266."? YES NO

13.4.D.2.f

h. Does the marketer keep copies of the following records for at least three years:

1. Copies of analysis for used oil which he claims meets specifications? YES NO

2. An operating log containing the following information for each shipment of used oil fuel that meets specification: Name and address of the receiving facility; the quantity of used oil fuel delivered; date of shipment or delivery; and a cross-reference to the record of used oil analysis? YES NO

3. For each shipment of off-specification used oil fuel initiated, a copy of each invoice? YES NO

14. For burners (recyclers) of used oil fuel:

13.4.E.2

a. Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning YES NO

activities and received an EPA Identification Number? NA

13.4.E.3 **b.** Prior to accepting the first shipment of off-specification used oil fuel from a marketer, did the burner provide each marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and received an EPA ID Number, and that he will burn used oil only in an industrial furnace or boiler? YES NO

13.4.E.5. **c.** Has the burner kept a copy of each of the following for at least three years:

1. Each invoice he has received? YES NO

2. Copies of each analysis of used oil fuel? YES NO

3. A copy of each certification notice that he sends to a marketer? YES NO

For facilities who answered "Yes" to question 3, complete questions 15 through 16:

NA

13.5.B.1. **15.** Have persons who generate, transport or store recyclable materials used for precious metal recovery met the following requirements:

13.5.B.1.a **a.** Notification requirements of VHWMR Part IV? YES NO

13.5.B.1.a **b.** Manifest requirements of VHWMR Part V? YES NO

c. Has the storer of recyclable materials verified that the transporter has a valid Virginia hazardous waste transporter permit? YES NO

13.5.B.1.b **d.** For transporters, obtained a transporter permit in accordance with VHWMR Section 7.3, and used a manifest system in accordance with VHWMR Section 7.5? YES NO

N/A

13.5.B.1.b	**e.** For storers, have they followed the appropriate manifesting and recordkeeping requirements of VHWMR Section 9.4?	YES	NO
13.5.B.2	**16.** For persons who store recyclable materials, have the following records been kept to document that they are not accumulating these materials speculatively:		
	a. Records showing the volume of these materials stored at the beginning of the calendar year; and	YES	NO
	b. The amount of these materials generated or received during the calendar year; and	YES	NO
	c. The amount of materials remaining at the end of the calendar year?	YES	NO
	d. Has the storer turned over at least 75% of his stored recyclable materials in the preceding calendar year?	YES	NO

For facilities who answered "Yes" to number 4:

N/A

13.6.B.	**17.** For facilities who store spent lead-acid batteries before reclaiming them:		
13.6.B.1.	a. Has the facility filed a Notification	YES	NO
13.6.B.3.	b. Has the facility complied with the appropriate sections of VHWMR Part X (except 10.1.C., 10.4.A., and 10.4.E.)?	YES	NO
13.6.B.4.	c. Has the facility complied with all applicable provisions of VHWMR Parts XI and XII?	YES	NO

18. Comments: _____